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March 8, 2012

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Subject: Periodic Review of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary

Dear Chair Hoppin and Members of the State Water Resources Control Board:

Contra Costa Water District (CCWD) appreciates this opportunity to provide input regarding the State Water Resources Control Board's process for the periodic review of the Water Quality Control Plan (WQCP). This letter is in response to discussion at the State Water Board meeting on February 21, where members of the Board asked stakeholders to provide recommendations on specific topics for workshops to be organized for the comprehensive review of the WQCP.

As I stated on behalf of CCWD at the February 21st State Water Board meeting, CCWD supports the State Water Board's decision to proceed with the comprehensive review of the WQCP. The State Board is the responsible agency to balance ecosystem needs with the needs of all beneficial uses, including all water supply uses. Comprehensive review and update of the WQCP should not be delayed by the Bay Delta Conservation Plan (BDGP), which is focused on Delta exports rather than all beneficial uses throughout the watershed and does not include the balancing that is the prerogative and responsibility of the State Water Board.

CCWD recommends that the State Water Board incorporate additional opportunities for stakeholder input to the comprehensive review, consistent with meeting the schedule. CCWD recommends a workshop be convened to discuss any potential Old and Middle River (OMR) flow requirements and implementation. Such a workshop would include a review of data to examine the effectiveness of net flow restrictions in Old and Middle Rivers, which have now been implemented for five consecutive years under various hydrological conditions. The current OMR net flow requirements specified in the 2008/9 Biological Opinion regarding the joint operations of the State Water Project and Central Valley Project were designed to reduce take of listed species at the export facilities of those projects; implementation of any OMR flow requirements should be

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focused on those export facilities. The workshop would also address implementation of OMR flow requirements that meet the balancing requirements with which the State Water Board is charged. At the request of Chair Hoppin at the March 2010 Delta Flow Criteria Informational Proceedings, CCWD submitted an approach that would both protect the public trust resources and allow efficient operations. This method, and others, should be considered at the workshop.

Thank you for this opportunity to provide input regarding the WQCP periodic review. If you have any questions, please call me at (925) 688-8083.

Sincerely,



Leah Orloff
Water Resources Manager

LO/DS:wec

cc: Les Grober, SWRCB
Diane Riddle, SWRCB
Karen Niiya, SWRCB